

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WESTPORT INSURANCE
CORPORATION,

Plaintiff

v.

RICHARD C. HEIDLAGE; KOTIN,
CRABTREE AND STRONG, LLP;
CHARLES N. ZALIS, individually;
CHARLES N. ZALIS, in his capacity as
General Partner of the CHARLES N.
ZALIS FAMILY LIMITED PARTNERSHIP;
and NORTH AMERICAN
UNDERWRITING MANAGERS, INC.,

Defendants.

Case No. 05CV11780NMG

MOTION TO APPEAR PRO HAC VICE

The plaintiff, Westport Insurance Corporation (“Westport”), by its attorney, Steven J. Bolotin of Morrison Mahoney LLP, respectfully moves that attorneys, Jeffrey A. Goldwater and Robert A. Chaney, both of the Bar of the State of Illinois, be admitted to practice, before the Bar of the United States District Court for the District of Massachusetts, pro hac vice. In support hereof, Westport states as follows:

1. Attorneys Chaney and Goldwater represent Westport nationally.
2. Westport desires to have Attorneys Chaney and Goldwater participate as trial counsel in this matter.
3. Attorneys Chaney and Goldwater are licensed attorneys in good standing in all of the courts before which they are admitted. (See Affidavit of Robert A. Chaney, Esq., attached hereto as Exhibit A and Affidavit of Jeffrey A. Goldwater, Esq., attached hereto as Exhibit B).
4. Attorneys Chaney and Goldwater have been admitted *pro hac vice* before the United States District Court for the District of Massachusetts.
5. The undersigned counsel will remain actively associated with Attorneys Chaney and Goldwater in the defense of this matter.

Wherefore, it is respectfully requested that the motion to admit Attorney Chaney and Goldwater to this Court *pro hac vice* be allowed.

For the Plaintiff,

Westport Insurance Corporation,

/s/sbolotin

Steven J. Bolotin, BBO#564085

MORRISON MAHONEY LLP

250 Summer Street

Boston, MA 02210

(617) 439-7500

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

WESTPORT INSURANCE
CORPORATION,

Plaintiff

v.

RICHARD C. HEIDLAGE; KOTIN,
CRABTREE AND STRONG, LLP;
CHARLES N. ZALIS; and NORTH
AMERICAN UNDERWRITING
MANAGERS, INC.,

Defendants.

Case No. 1:05 cv 11780 NMG

**AFFIDAVIT IN SUPPORT OF
MOTION TO APPEAR PRO HAC VICE**

Under oath, I depose and state the following:

1. My name is Robert A. Chaney.
2. I am an attorney admitted to practice before the state courts of Illinois, the United States District Courts for Illinois, and the Court of Appeals for the First, Seventh, Eighth and Eleventh Circuits. I have been licensed to practice law at all times since 1981.
3. I am presently a member in good standing with each of these state and federal bars.
4. I have been associated with the firm of Bollinger, Ruberry & Garvey since 1995.

WHEREFORE, I respectfully request that my motion to be admitted *pro hac vice* for the purposes of this case be allowed.

Signed under the pains and penalties of perjury the 21 day of October, 2005.

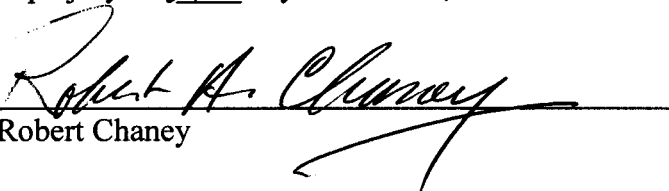

Robert Chaney

EXHIBIT B

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

WESTPORT INSURANCE
CORPORATION,

Plaintiff

v.

RICHARD C. HEIDLAGE; KOTIN,
CRABTREE AND STRONG, LLP;
CHARLES N. ZALIS; and NORTH
AMERICAN UNDERWRITING
MANAGERS, INC.,

Defendants.

Case No. 1:05 cv 11780 NMG

**AFFIDAVIT IN SUPPORT OF
MOTION TO APPEAR PRO HAC VICE**

Under oath, I depose and state the following:

1. My name is Jeffrey A. Goldwater.
2. I am an attorney admitted to practice before the state courts of Illinois, Michigan and Florida, the United States District Courts for Illinois, and the Court of Appeals for the Second, Third and Seventh Circuits. I have been licensed to practice law at all times since 1985.
3. I am presently a member in good standing with each of these state and federal bars.
4. I have been associated with the firm of Bollinger, Ruberry & Garvey since 1988.

WHEREFORE, I respectfully request that my motion to be admitted *pro hac vice* for the purposes of this case be allowed.

Signed under the pains and penalties of perjury the 24th day of October, 2005.



Jeffrey A. Goldwater